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**Order Instituting Rulemaking into Transfer of Master-Meter/Submeter  
Systems at Mobilehome Parks and Manufactured Housing  
Communities to Electric and Gas Corporations  
R 11-02-018**

Proposal of Pacific Gas and Electric Company

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# Summary of PG&E's Proposal

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- Supports the Commission's Stated Intent of Transitioning to Direct Utility Service
- Removes Identified Barriers to Transition to Direct Utility Service
- Acceptance of All Voluntary Requests
- Complete Replacement of Existing Systems
- Existing Systems Left In Place and Made Safe (de-pressurized or de-energized)
- Increases Safety, Reliability and Capacity of Facilities Serving Mobilehomes (constructs to current standards)
- Customer Experience

# Considerations Advising PG&E's Approach

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- Compatibility of Existing Systems with PG&E's Facilities
  - System Design and Materials/Components
    - layout
    - co-location of other utilities/non-energy facilities
    - components used in construction
  - Construction and Maintenance
    - construction techniques, adherence to standardized specifications for depth, cover material, etc.
    - maintenance and repair practices
  - Construction and Maintenance Records
    - availability of documentation
    - compatibility of formats to PG&E systems

# Considerations (cont.)

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- Ability to inspect/confirm facilities
  - overhead systems
    - records to be used to plan inspection work
    - equipment test results
  - underground systems
    - records to be used to plan inspection work
    - consistency of repairs
    - test results

# Ratemaking

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- Full Cost Recovery Outside GRC
- Two-way Balancing Account
- Updates (via Advice Letter) as Necessary

# Conversion Process

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- Solicitation of Participants (MHP Owner/Operators)
- Assessment of Volunteered Systems for Conversion
- Prioritization
- Outreach to MHP Owner/Operators and Residents
- Construction
- Customer Enrollment

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# Questions?